

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD M. WULF, JR., as an
individual and as a representative of the
classes,

Plaintiff,

v.

BANK OF AMERICA, N.A., and BAC
HOME LOANS SERVICING, L.P.,

Defendants.

Case No.: 2:10-cv-05176-MAM

**PLAINTIFF'S MOTION TO AMEND THE COMPLAINT AND ADD A SECOND
NAMED PLAINTIFF**

Pursuant to Federal Rules of Civil Procedure 15(a) and 20(a), Plaintiff Richard M. Wulf, Jr. moves for an order allowing Plaintiff to file the First Amended Complaint attached hereto as Exhibit 1, and join Karyl Resnick as a second named plaintiff. This motion is based on Plaintiff's accompanying memorandum of law, the allegations in the proposed First Amended Complaint, the accompanying declaration of counsel, the arguments of counsel, Plaintiff's forthcoming reply brief, and all files, records, and proceedings in this matter.

Dated: April 29, 2011

Respectfully submitted,

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/s/ Kai Richter

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